

## LAW OFFICES OF JILL R. SHELLOW

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Telephone: 212.792.4911 / Fax: 212.792.4946 / [jrs@shellowlaw.com](mailto:jrs@shellowlaw.com)  
All correspondence to: 80 Broad Street, Suite 1900, New York, NY 10004

September 4, 2020

**VIA ECF AND EMAIL**

The Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
[PreskaNYSDChambers@nysd.uscourts.gov](mailto:PreskaNYSDChambers@nysd.uscourts.gov)

The requested extension is granted.  
SO ORDERED.

 9/8/2020

RE: *United States v. Rafael Romero*, 88-cr-642 (LAP)

Dear Judge Preska:

I am writing to request a third extension of time until November 6, 2020 to make a supplemental submission in further support for Rafael Romero's pro se motion for compassionate release. The Government consents to this request.

In order to complete my work, I need access to the trial documents. Mr. Romero no longer has these materials. The Government has given me its digitally stored documents, but they do not include, for example, pretrial motions or the requests to charge. The closed case Clerk's Office tells me that the Court file is in two boxes at the Federal Records Center in Missouri. The Records Center remains closed because of the COVID 19 pandemic. On September 1, apparently the Records Center started Phase One of its reopening plan and the Clerk suggested that I check back in four weeks. The United States Attorney's Office case files are similarly in storage, and it is not possible to predict when they will be able to be retrieved.

Mr. Romero has served 30+ years of a life sentence imposed pursuant to the mandatory Federal Sentencing Guidelines for his role in a narcotics conspiracy where a law enforcement officer was seriously wounded (but did not die). I want to be certain that I fully understand the record when I make my supplemental submission.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow